

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JASON GOODMAN,
Plaintiff,

v.

CHRISTOPHER ELLIS BOUZY, et al.,
Defendants.

Case No. 1:21-cv-10878

**DEFENDANTS BENJAMIN WITTES' AND NINA JANKOWICZ'S NOTICE OF
MOTION FOR RECONSIDERATION BASED ON NEW EVIDENCE**

PLEASE TAKE NOTICE that upon the accompanying memorandum and pursuant to Federal Rule of Procedure 60(b) and Local Rule 6.3, Defendants Benjamin Witles and Nina Jankowicz (together, "Movants") respectfully request that the Court reconsider the portion of its Report and Recommendation, ECF No. 203, recommending the denial of an award of attorneys' fees and costs as a sanction for Plaintiff Jason Goodman's abuse of the legal system and harassing litigation tactics. As set forth in the accompanying Memorandum, this Motion is based on new evidence created and published by Plaintiff after the Court issued its Report and Recommendation.

Pursuant to Local Rule 7.2, Movants will provide all unrepresented parties with copies of decisions cited in the accompanying memorandum of law that are unreported or reported exclusively on computerized databases.

Dated: May 16, 2023

Respectfully submitted,

/s/ Elizabeth C. Lockwood
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of May, 2023, I caused true and correct copies of the foregoing Notice of Motion to be served electronically via ECF on the following:

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I additionally certify that on the 16th day of May, 2023, I caused true and correct copies of the foregoing Notice of Motion to be served via email and U.S. Mail First Class on the following:

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By: /s/ Elizabeth Lockwood